

August 18, 2020

Via ECF

Hon. Mitchell S. Goldberg
U.S. Courthouse
601 Market Street
Room 7614
Philadelphia, PA 19106

Re: Expert and Pre-Trial Extension in *Catlin Specialty Insurance Co. v. J.J. White, Inc., Sunoco, Inc., and Sunoco, Inc. (R&M)*, 14-cv-01255-MSG

Dear Judge Goldberg:

Pursuant to your Standing Policies and Procedures Order, the parties write this letter to jointly request an extension of expert discovery and pre-trial deadlines, consistent with our accompanying proposed order.

The parties have worked diligently to produce discovery materials and expert reports. Because of the COVID-19 outbreak, however, the parties have been unable to schedule the remaining three expert depositions. The parties' experts are located in Pennsylvania, Texas, and California. Counsel is located in Pennsylvania and New York. The parties therefore request an extension of expert discovery and pre-trial deadlines, so that the parties may complete expert discovery before exchanging exhibit lists and filing pre-trial motions.

The parties appreciate the Court's accommodation. Should the Court need any additional information, the parties stand ready to have a conference call with the Court and to respond to any questions or concerns the Court may have.

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Very truly yours,

/s/ Patrick M. Tomovic
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